# **EXHIBIT B**

From: Sison, Conrad V. [CSison@lordbissell.com]

Sent: Wednesday, July 19, 2006 8:04 PM

To: Herbert C Ross

Subject: RE: protective order - Koken v. GPC

#### Herb:

I have reviewed the document. CIGA cannot sign on to the stipulation nor will CIGA agree to submit to the jurisdiction of the Delaware federal court. All other terms are generally acceptable.

Conrad V. Sison, Esq.
Lord, Bissell & Brook LLP
300 S. Grand Ave., Suite 800
Los Angeles, California 90071
Office: (213) 687-6791
Fax: (213) 341-6791
mailto:csison@lordbissell.com

----Original Message----

From: Herbert C Ross [mailto: HRoss@olshanlaw.com]

Sent: Friday, July 14, 2006 11:30 AM

To: SBellew@cozen.com; GArth@foxrothschild.com; Sison, Conrad V.

Cc: jseaman@bmf-law.com

Subject: protective order - Koken v. GPC

#### Counsel,

Atttached for your review and approval is a protective order addressed to confidentiality of documents in the referenced action. Please respond to me ASAP on this protective order.

Herb Ross

To ensure compliance with requirements imposed by the IRS, we inform you that unless specifically indicated otherwise, any tax advice contained in this communication (including any attachment to this communication, other than an attachment which is a formal tax opinion) was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding tax-related penalties under the Internal Revenue Code, or (ii) promoting, marketing, or recommending to another party any tax-related matter addressed herein.

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Case 1:05-cv-00223-SLR Document 60-3 Filed 07/27/2006 Page 4 of 13

# **EXHIBIT C**

From: Herbert C Ross [HRoss@olshanlaw.com]

**Sent:** Friday, July 21, 2006 12:51 PM

To: SBellew@cozen.com; GArth@foxrothschild.com

Cc: John Seaman

Subject: Fwd: RE: protective order - Koken v. GPC

RE: protective order - Koken v...

Jerry and Sean,

Do you any comments on the stipulated protective order addressed to confidentiality of documents that I sent to you on July 14. Attached are the comments from Conrad Sison for CIGA. Please respond to me ASAP.

Herb

To ensure compliance with requirements imposed by the IRS, we inform you that unless specifically indicated otherwise, any tax advice contained in this communication (including any attachment to this communication, other than an attachment which is a formal tax opinion) was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding tax-related penalties under the Internal Revenue Code, or (ii) promoting, marketing, or recommending to another party any tax-related matter addressed herein.

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From:

Sison, Conrad V. [CSison@lordbissell.com]

Sent:

Wednesday, July 19, 2006 8:04 PM

To:

Herbert C Ross

Subject:

RE: protective order - Koken v. GPC

#### Herb:

I have reviewed the document. CIGA cannot sign on to the stipulation nor will CIGA agree to submit to the jurisdiction of the Delaware federal court. All other terms are generally acceptable.

Conrad V. Sison, Esq. Lord, Bissell & Brook LLP 300 S. Grand Ave., Suite 800 Los Angeles, California 90071 Office: (213) 687-6791 Fax: (213) 341-6791

mailto:csison@lordbissell.com

----Original Message----

From: Herbert C Ross [mailto: HRoss@olshanlaw.com]

Sent: Friday, July 14, 2006 11:30 AM

To: SBellew@cozen.com; GArth@foxrothschild.com; Sison, Conrad V.

Cc: jseaman@bmf-law.com

Subject: protective order - Koken v. GPC

#### Counsel,

Atttached for your review and approval is a protective order addressed to confidentiality of documents in the referenced action. Please respond to me ASAP on this protective order.

Herb Ross

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\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

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**EXHIBIT D** 

.....

From: Sent:

Bellew, Sean [SBellew@cozen.com] Sunday, July 23, 2006 12:01 PM

To:

Herbert C Ross; GArth@foxrothschild.com

Cc:

John Seaman

Subject:

RE: RE: protective order - Koken v. GPC

If Gerry has no issues, I will not.

Sean J. Bellew, Esquire COZEN O'CONNOR Chase Manhattan Centre 1201 N. Market Street, Suite 1400 Wilmington, DE 19801 (302) 295-2026 (direct) (302) 295-2013 (fax)

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From: Herbert C Ross [mailto: HRoss@olshanlaw.com]

Sent: Friday, July 21, 2006 12:51 PM

To: Bellew, Sean; GArth@foxrothschild.com

Cc: jseaman@bmf-law.com

Subject: Fwd: RE: protective order - Koken v. GPC

Jerry and Sean,

Do you any comments on the stipulated protective order addressed to confidentiality of documents that I sent to you on July 14. Attached are the comments from Conrad Sison for CIGA. Please respond to me ASAP.

Herb

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Case 1:05-cv-00223-SLR Document 60-3 Filed 07/27/2006 Page 11 of 13

# **EXHIBIT E**

From: Arth, Gerald [GArth@foxrothschild.com]

Sent: Sunday, July 23, 2006 11:01 AM
To: Herbert C Ross; SBellew@cozen.com

Cc: John Seaman; Garber, Cheryl; Rennie, Sheldon K.

Subject: RE: RE: protective order - Koken v. GPC

#### Herb:

The Liquidator of Reliance will not agree to the protective order.

### Jerry

----Original Message----

From: Herbert C Ross [mailto: HRoss@olshanlaw.com]

Sent: Friday, July 21, 2006 12:51 PM To: SBellew@cozen.com; Arth, Gerald

Cc: jseaman@bmf-law.com

Subject: Fwd: RE: protective order - Koken v. GPC

Jerry and Sean,

Do you any comments on the stipulated protective order addressed to confidentiality of documents that I sent to you on July 14. Attached are the comments from Conrad Sison for CIGA. Please respond to me ASAP.

Herb

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Thank you.